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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RHONDA TAYLOR MITCHELL,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-01979-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR REVERSAL
AND/OR REMAND (FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Motion) to July 14, 2021. This is Defendant's first request for extension to respond to Plaintiff's Motion and second request in this case. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then Defendant's counsel will draft the responsive brief. Counsel

1 contacted Plaintiff on June 14, 2021 and Plaintiff does not object to this request.

2 This request is made in good faith with no intention to unduly delay the proceedings.

3 Counsel apologizes to the Court for any inconvenience caused by this delay.

4 Respectfully submitted this June 14, 2021.

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6 CHRISTOPHER CHIOU
Acting United States Attorney

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9 /s/ Chantal R. Jenkins
10 CHANTAL R. JENKINS
Special Assistant United States Attorney

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12 OF COUNSEL:

13 DEBORAL LEE STACHEL
14 Regional Chief Counsel, Region IX

15 IT IS SO ORDERED:

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19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: June 16, 2021

CERTIFICATE OF SERVICE

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the
MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

Hal Taylor
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Email: haltaylorlawyer@gbis.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 14, 2021

/s/ Chantal R. Jenkins
CHANTAL R. JENKINS
Special Assistant United States Attorney